

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

THE NEW YORK TIMES COMPANY,

Plaintiff,

v.

OPENAI, INC., OPENAI LP, OPENAI GP, LLC,  
OPENAI, LLC, OPENAI OPCO LLC, OPENAI  
GLOBAL LLC, OAI CORPORATION, LLC,  
OPENAI HOLDINGS, LLC, and MICROSOFT  
CORPORATION,

Defendant.

Civil Action No. 1:23-cv-11195-SHS

**DECLARATION IN SUPPORT OF  
MOTION FOR ADMISSION OF  
ATTORNEY PRO HAC VICE**

Katherine M. Peaslee, declares:

1. I am a Partner with the law firm of Susman Godfrey L.L.P.
2. I submit this declaration in support of my motion for admission to practice *pro hac vice* in the above-captioned matter.
3. As shown in the Certificates of Good Standing annexed hereto, I am a member in good standing of the State Bar of Washington and State Bar of California.
4. There are no pending disciplinary proceedings against me in any state or federal court.
5. I have never been convicted of a felony.
6. I have never been censured, suspended, disbarred, or denied admission or readmission by any court.
7. My attorney registration number for the State Bar of Washington is 52881 and for the State Bar of California is 310298.

8. Wherefore, your declarant respectfully submits that she be permitted to appear as counsel and advocate *pro hac vice* in case 1:23-cv-11195 for Plaintiff (The New York Times Company).

I, Katherine M. Peaslee, declare under penalty of perjury that the foregoing is true and correct.

Dated: March 1, 2024

Respectfully submitted,

/s/ Katherine M. Peaslee  
Katherine M. Peaslee  
WA State Bar No. 52881  
CA State Bar No. 310298  
SUSMAN GODFREY L.L.P.  
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***Attorney for Plaintiff  
The New York Times Company***